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T.R.A. DOCKET ROOM

August 31, 2004

Hon Pat Miller, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

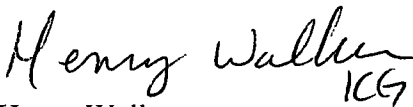
Re: *Petition for Exemption of Certain Services*
Docket No. 03-00391

Dear Chairman Miller.

Enclosed please find the original and fourteen (14) copies of AT&T Communication of the South Central States, LLC's First Request of Production For Document (No 1) to BellSouth Telecommunications, Inc , which was inadvertently omitted from AT&T's filing in this docket on August 30, 2004.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/krq

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100071-001 8/31/2004

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BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

August 30, 2004

IN RE:

PETITION FOR EXEMPTION OF CERTAIN SERVICES) DOCKET NO.03-00391

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S
FIRST REQUEST OF PRODUCTION FOR DOCUMENT (NO. 1)
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Tennessee Regulatory Authority's Code Ann. § 65-4-118(c)(2)(A) and the Tennessee Rules of Civil Procedure, hereby serves its First Request for Production of Document to BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1 "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc

2 The terms "you" and "your" refer to BellSouth.

3. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h)

4. "AT&T" means AT&T Communications of the South Central States, LLC, its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T

5 The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6 The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7 The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents

8. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope

of these discovery requests any information that would otherwise not be brought within their scope.

10. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

11. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis,
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged

2 These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and require supplemental responses should additional documents become available.

DOCUMENT REQUESTS

1. Please provide the most current materials, manuals and / or documentation used by BellSouth in training its sales personnel to sell PRI ISDN service.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

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Counsel for AT&T Communications of the South Central States, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2004, a copy of the foregoing document was served on the following parties of record:

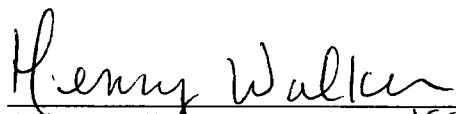
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